

US Environmental Protection Agency  
Region 2–Caribbean Environmental Protection Division  
*Resource Conservation and Recovery Act (RCRA)*  
*Compliance Evaluation Inspection Report*



**Central Ford (Centro Camiones, INC.)**  
EPA ID Number: *PRR000022046*

Address

Mailing

P.O. Box 11411  
Caparra Heights Station  
San Juan, PR 00922

Physical

Carr. 2 Km 28.5  
Barrio Espinoza  
Vega Alta, PR. 00692

Coordinates

18.413669 N, -66.309114 E (WGS84)

Inspector:

Rosana Caballer Cruz, Environmental Engineer, [caballer.rosana@epa.gov](mailto:caballer.rosana@epa.gov)  
Jesse Avilés, Environmental Scientist, [aviles.jesse@epa.gov](mailto:aviles.jesse@epa.gov)

Facility Representatives: 787-915-5000

Mr. Victor Reyes, Storage  
Mr. Andrés Polanco, Service Director

Inspection Date: March 1, 2013

Project ID: CEPD-RCRA-13-0267

Record schedule: 108-025-05 478(b)

Status: FINAL

File: Central Ford CEI 1.docx

## 1 INTRODUCTION

A Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) was conducted on March 1, 2013 at Central Ford (Centro Camiones, INC.) facility. The facility is located at Carr. 2 Km 28.5 Barrio Espinoza, Vega Alta, PR. *Figure 1* shows the location of the facility on a portion of the Vega Alta Topographical Map. *Figure 2* shows an aerial photograph of the facility. The inspection consisted of an opening meeting to discuss the purpose of the inspection and request information about the facility, a facility tour, review of facility documents and a closing meeting. The facility was inspected as part of the core program.

## **2 OPENING MEETING**

Mr. Jesse Avilés and I met with Mr. Victor Reyes, Storage Personnel and Mr. Andrés Polanco, Service Director for the opening meeting. We told them that our purpose was to do a compliance evaluation inspection about their management of hazardous waste.

### **2.1 FACILITY OPERATION**

CFVA is a facility that sells new and used vehicles, such as compact and sedans cars, SUVs, vans and pickups. The new vehicles are from two brands: Ford and Hyundai models. For the trade-ins and used cars, they have a variety of brands available. CFVA is more than a dealer; they also have a mechanic workshop that provides maintenance for the Ford and Hyundai models.

CFVA occupied this lot approximately 5 years. The owners bought the lot and constructed two dealers: one for Ford models and one for Hyundai models. This occurred after the consolidation of various dealers thru the island. The distribution of the buildings is as follows: In the Ford building was found the new Ford cars for sale, customer service, pieces storage area and the mechanic workshop. In the Hyundai building was found the Hyundai customer service and the new Hyundai cars for sale.

### **2.2 SOLID AND HAZARDOUS WASTE GENERATION**

During the opening meeting, we asked CFVA staff to told us their hazardous waste generation. The hazardous wastes generated by the facility are: rags with used oil, coolant and waste combustible liquid. For their coolant and rags with used oil, CFVA has a contract with Empresas Vieques Septical Oil Collection Service Company and for the waste combustible liquid; CFVA has a contract with Safety Kleen. Also, facility staff told us that part washers are available at the mechanic workshop.

Universal waste: We asked about their fluorescent lamps disposal. Facility staff notified us that they did not made any fluorescent lamps disposal. CFVA did not have the need to change any lamp since construction their date. For their used oil, CFVA has a contract with Rubén Martínez Oil Collection Company. The batteries generated at CFVA are recycled with Interstate Batteries.

## **3 SITE TOUR**

Mr. Victor Reyes, Storage Personnel and Mr. Andrés Polanco, Service Director accompanied us during the tour. Pictures taken during the inspection are presented in *Appendix 1*.

### **3.1 "TALLER" AREA (MECHANIC WORKSHOP)**

The mechanic workshop area was the first area visited during the facility tour. This is an open building that provides the mechanical maintenance and/or repair to Ford and Hyundai vehicles. At this area we observed 12 operational bays that are available to repair Ford and Hyundai vehicles. Inside the building we found a room that is known as the Transmissions Room (TR). TR is located at the left side of the building and inside we observed one part washer in use (See **Picture 1**). At the time of inspection, the part washer was open. We asked Mr. Victor Olivera, Technician, about the part washer and he told us that the company that gives services to them is



Safety Kleen and the disposal rate is approximately every three months. We advise the facility staff that the part washer needs to be close at all times. Mr. Victor Olivera then proceeded to close the part washer. Also, Mr. Victor Olivera told us that this room is used for assembling automatic transmissions.

Outside this room we found the pneumatic lift area. Inside we observed a 5-gallon container with used oil. We advised the facility staff that this drum need to be label with the phrase "Used Oil". A battery was observed. We advised the facility that they need to identify a place to store the batteries and need to identify them with the phrase: "Universal Waste". Facility staff told us that they will identify an area to store the batteries and will identify them with the phrase "Universal Waste".

Also, we observed the following:

- Two 55-gallon drums with used filters (See **Picture 2**).
  - At the time of inspection one was full and the other one have approximately 20 filters. Both drums need to be labeled.
- Two part washers
  - At the time of inspection both of them were closed.
- Two 5-gallons containers with (from left to right) (See **Picture 3**)
  - No content
  - 1/3 full with gasoline for disposal. Both containers need to be labeled.
- One 55-gallons drum with rags with used oil
  - The drum was full and needs to be labeled.
- Approximately 7 16-oz containers (Refreshments containers as Coca Cola and Coco Rico) with coolants and "unknowns" inside (See **Picture 3**).
  - The containers did not have a label.
- Various batteries were observed thru the area.
  - Facility staff will identify a place to store the batteries and will identify them with the phrase: "Universal Waste".

### **3.2 OUTSIDE "TALLER" AREA**

This area is located alongside the "Taller" Area. A 250-gallons tank was observed. The tank has a dike and have label (See **Photo #4**). The dike is not clean; dust and rags were observed. We advised the facility staff that they need to clean the dike and need to remove the rags observed inside. CFVA staff told us that they will clean the dike. Also, just in front of the dike a plastic pallet with various batteries was observed (See **Picture 4**). Facility staff told us that they will store all the batteries segregated thru the facility in this place and they will identify the area with the phrase: "Universal Waste". The area rendered no concerns.

### **3.3 MECHANIC SHOP (HEAVY VEHICLES) AREA**

This area is located outside the CFVA main building and "Taller" area. Inside this area were observed the following:

- One part washer

- At the time of inspection, the part washer was open. We advised the facility staff that they need to have the part washer close at all times. Facility staff then proceeded to close the part washer.
- Two 55-gallon drums with solid waste, used oil rags and hazardous waste mixed.
  - We advised the facility staff that they need to segregate the waste and need to identify the containers. (i.e. Hazardous Waste, Solid Waste, etc.)
- Batteries
  - Batteries were observed at the area. CFVA staff will store them at the area just designated during the facility tour (Outside "Taller" Area) and will identify them as "Universal Waste".

## **4 DOCUMENT REVIEW**

We reviewed the documents after the site tour. Mr. Victor Reyes, Storage Personnel and Mr. Andrés Polanco provided the documents, stayed with us and answered our questions while we reviewed them.

### **4.1 HAZARDOUS WASTE MANIFESTS**

The hazardous waste manifests for the last three years were requested. Mr. Victor Reyes and Mr. Andrés Polanco provided the documents. We observed that the CFVA generation were less than 100 kg per month. The revision of the documents rendered no concerns.

### **4.2 USED OIL MANIFESTS**

The used oil manifests were requested. Mr. Victor Reyes and Mr. Andrés Polanco provided the documents. CFVA made their used oil disposal with Rubén Martínez Oil Collection Service Company. The last pick up was on February 20, 2013. The revision of the documents rendered no concerns.

### **4.3 COOLANT AND RAGS WITH USED OIL MANIFESTS**

The coolant and rags with used oil manifests were requested. Mr. Victor Reyes and Mr. Andrés Polanco provided the documents. CFVA made their coolant and rags with used oil disposal with Empresas Vieques Septical Oil Collection Services Company. The last pick up was on August 28, 2012. The revision of the documents rendered no concerns.

## **5 CLOSING MEETING**

We had the closing meeting with Mr. Victor Reyes, Storage Personnel, Mr. Andrés Polanco, Service Director, Mr. Eugene Cianchini, Comptroller and Mr. Juan L. Vázquez, Accounting Manager. During the closing meeting we discussed the observations made during the facility tour.

## **6 FOLLOW-UP ACTIONS**

We requested pictures that showed that our observations were corrected. Mr. Victor Reyes, Storage Personnel, sent me an email providing the pictures on March 18, 2013 at 1053 hrs.



## **7 CONCLUSIONS**

### **7.1 GENERATORS**

The facility identifies itself as a LQG. After the review of the manifests, we identified that CFVA facility is generating as a Conditionally Exempt Small Quantity Generator (CESQG). We advise the facility staff to resubmit the EPA Form 8700-12 and request a change in their generator status. The facility's compliance with the applicable Generator requirements is as follows.

#### **7.1.1 Special Requirements for hazardous waste generated by conditionally exempt small quantity generators (40 CFR § 261.5 Subpart A)**

##### **7.1.1.1 40 CFR § 261.5 (g)(1)**

CFVA failed to comply with this requirement. According with §261.5 (g)(1) "... *the generator must comply with the following requirement: Section §262.11 of this chapter*". Section §262.11 states that: "*a person who generates a solid waste ... must determine if that waste is hazardous*"

At the time of inspection CFVA have approximately 7 16-oz containers (Refreshments containers as Coca Cola and Coco Rico) with coolants, gasoline and "unknowns" inside.

### **7.2 TRANSPORTERS**

The facility is not a transporter.

### **7.3 TREATMENT, STORAGE AND DISPOSAL FACILITIES**

The facility is not a TSD facility.

### **7.4 USED OIL (40 C.F.R. § 279)**

#### **7.4.1 Subpart C – Standards For Used Oil Generators**

CFVA failed to comply with this requirement. Section §279.22 (c)(1) *as referenced by 40 CFR §261.5 (j)* states that: *Containers and above ground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil"*.

At the time of inspection, CFVA fails to comply with this requirement at the Mechanic Shop (Heavy Vehicles) Area. At the time of inspection, two 55-gallons drums with used oil with solid waste, used oil rags and hazardous waste mixed were observed.

## **8 MULTI-MEDIA CHECKLIST**

A Multi-Media inspection was not performed during the CEI.

## **9 ENFORCEMENT ACTIONS**

Based on the information presented above, I recommend the following enforcement actions:

1. No actions will be made against the facility.



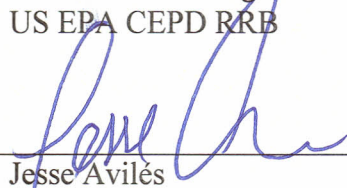
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Rosana Caballer Cruz  
Environmental Engineer  
US EPA CEPD RRB




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Date



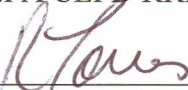
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Jesse Avilés  
Environmental Scientist  
US EPA CEPD RRB



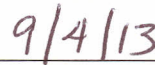
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Date



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Ramón Torres  
Branch Chief  
US EPA CEPD RRB



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Date





US Environmental Protection Agency

Title:

Figure 1: Central Ford Vega Alta, PR

Project:

CEPD-RCRA-13-0267





US Environmental Protection Agency

Title:

Figure 2: Central Ford Vega Alta, PR

Project:

CEPD-RCRA-13-0267



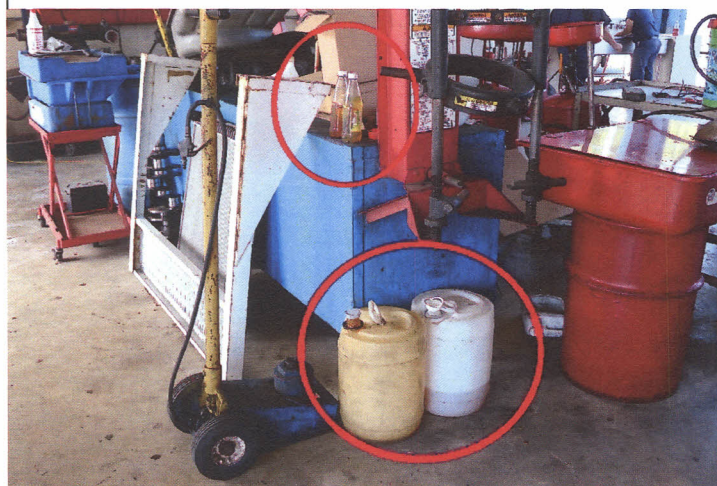


Picture 1— **“Taller Area” (Mechanic Workshop)** - An open part washer was observed inside the transmissions room.



Picture 2— **“Taller Area” (Mechanic Workshop)** - Two 55-gallon drums with used filters was observed. The drum located at left side have inside approximately 20 filters. The 55-gallon drum located at right side is full.

### UNKNOWN



### GASOLINE

Picture 3— **“Taller Area” (Mechanic Workshop)** - Two 5-gallons containers were observed. The one located at left side is empty and the one located at right side is 1/3 full with gasoline. Also, two of the seven 16 oz containers with "unknown" were observed.



Picture 4— **Outside “Taller” Area**— A 250-gallons tank was observed. The tank has a dike and has its label . Also, just in front of the dike a plastic pallet with various batteries was observed. Facility staff has identified this place to store their batteries and will label the area with the words “Universal Waste”.



Title:

Appendix 1—Site Pictures

EPA ID:

PRR000022046

Project:

CEPD-RCRA-13-0267

Pictures taken by:

J. Avilés





## Handler Details



CENTRAL FORD

VEGA ALTA

PRR000022046

Universes for Puerto Rico

View Universes for PR

## Handler Universes

Active Status	Controls in Place	In a Universe	Gen. Status	Transporter	Univ. Waste	Recycler	Used Oil	Furnace Exempt	Importer	Onsite Burner Exempt	Mixed Waste Gen.	Underground Injection	HSM	Subpart K
H----	N	Y	LQG	N	N	N	NNNNNNN	N	N	N	N	N	N	----

## Permitting and Corrective Action Universes

Permit Workload	Closure Workload	Post-Closure Workload	Permit Progress	CA Workload	Subject to CA	Subject to CA - TSD	Subject to CA - Discretion	Subject to CA - Non-TSD
-----	-----	-----	-----	N	N	N	N	N

## Compliance, Monitoring and Enforcement and GPRA Universes

Full Enforcement	Operating TSDF	SNC	Out of State SNC	BOYSNC	Permit GPRA	Renewals GPRA	CA GPRA
-----	-----	N	N	N	N	N	N

## Source Summary Table

\*\* indicates this source record was used for the Universe Calculations.

Act. Loc.	▲ Source ▼	Sequence	▲ Receipt date ▼	▲ Certification date ▼	Federal Generator Status <a href="#">Hint</a>	Non-notifier
PR	<a href="#">N</a>	1	01/30/2009	01/26/2009	LQG	
PR	** <a href="#">I</a>	1	01/29/2009	01/29/2009	LQG	

[Site Detail Report](#)[History of Activity Report](#)[Maintain Other IDs \(0\)](#)[Historical Data](#)[Back to the Transaction Menu](#)

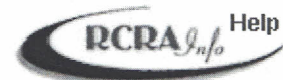
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## Evaluation List

**CENTRAL FORD****VEGA ALTA****PRR000022046**

There are no evaluations for this site.  
Please Add a New Evaluation or click the  
Cancel button to return to the CME Main  
Menu.

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URL: /rcrainfo/cme/cme\_eval\_list.jsp